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15 Attorneys for Defendants
C&A Marketing, Inc.; C&A Licensing, LLC;
16 and PLR IP Holdings, LLC

17 **UNITED STATES DISTRICT COURT**
18 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
19 **SAN FRANCISCO DIVISION**

20 GOPRO, INC.

21 Plaintiff,

22 v.

23 C&A MARKETING, INC., C&A
LICENSING, LLC, AND PLR IP
24 HOLDINGS, LLC,

25 Defendants.

26 AND RELATED COUNTERCLAIMS
27

Case No. 3:16-cv-03590-JST

**STIPULATION AND ~~PROPOSED~~
ORDER EXTENDING TIME FOR
PLAINTIFF TO FILE OPPOSITION TO
DEFENDANTS' MOTION TO STAY
LITIGATION PENDING *INTER PARTES*
REVIEW (DKT. NO. 40)**

Complaint Filed: June 27, 2016

1 Pursuant to Local Rule 6-1(b), Plaintiff GoPro, Inc. ("GoPro") and Defendants C&A
2 Marketing, Inc.; C&A Licensing, LLC; and PLR IP Holdings, LLC ("Defendants") hereby
3 stipulate as follows:

4 WHEREAS, on April 24, 2017, Defendants filed a Motion to Stay Litigation Pending
5 *Inter Partes* Review ("Motion to Stay") (Dkt. No. 40);

6 WHEREAS, GoPro requested a one week extension of time, and Defendants agreed to a
7 one week extension;

8 WHEREAS, GoPro's opposition is currently due on May 8, 2017, Defendants' reply is
9 due May 15, 2017, and the hearing is not set until June 15, 2017, thus providing sufficient time to
10 adjust the briefing schedule while maintaining at least fourteen days between Defendants' reply
11 brief and the hearing;

12 IT IS HEREBY STIPULATED AND AGREED that the time by which GoPro may file an
13 opposition to Defendants' Motion to Stay (Dkt. No. 40) is extended one week from May 8, 2017
14 to May 15, 2017;

15 IT IS FURTHER STIPULATED AND AGREED that the time by which Defendants shall
16 reply to GoPro's opposition to Defendants' Motion to Stay (Dkt. No. 40) is extended one week
17 from May 15, 2017 to May 22, 2017.

18 The parties previously stipulated to extend time to respond to the Complaint, to continue
19 the initial case management conference, to serve invalidity contentions and exchange preliminary
20 claim constructions, to serve damages contentions and responsive damages contentions, and to
21 file an opposition brief to GoPro's Motion for Leave to File an Amended Complaint. This
22 extension will not otherwise affect the schedule for the case.

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1 Dated: May 5, 2017

Dated: May 5, 2017

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3 KILPATRICK TOWNSEND & STOCKTON LLP

MORRISON & FOERSTER LLP

4 /s/ Mehrnaz Boroumand Smith

5 MEHRNAZ BOROUMAND SMITH

/s/ Nathan B. Sabri

NATHAN B. SABRI

6 Attorneys for Plaintiff GoPro, Inc.

Attorneys for Defendants C&A
Marketing, Inc.; C&A Licensing, LLC;
and PLR IP Holdings, LLC

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9 **ATTESTATION OF E-FILED SIGNATURE**

10 I, Mehrnaz Boroumand Smith, am the ECF User whose ID and password are being used to
11 file this **STIPULATION AND [PROPOSED] ORDER EXTENDING TIME FOR**
12 **PLAINTIFF TO FILE OPPOSITION TO DEFENDANTS' MOTION TO STAY**
13 **LITIGATION PENDING *INTER PARTES* REVIEW (DKT. NO. 40)**. In compliance with
14 Local Rule 5-1(i)(3), I hereby attest that Nathan B. Sabri has concurred in this filing.

15
16 Dated: May 5, 2017

/s/ Mehrnaz Boroumand Smith
Mehrnaz Boroumand Smith

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19 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

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21
22 Dated: May 8, 2017


Honorable Jon S. Tigar
United States District Judge